

1 KENNETH A. FEINSWOG
2 kfeinswog@aol.com
3 Bar No. 129562
4 6701 Center Drive West, Suite 610
5 Los Angeles, California 90045
Telephone: (310) 846-5800
Fax: (310) 846-5801

6 Attorney for Plaintiff
7

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE CENTRAL DISTRICT**
OF CALIFORNIA

10 -----X
11 BRAVADO INTERNATIONAL GROUP
12 MERCHANDISING SERVICES, INC.

CIVIL ACTION NO.
09-9066 PSG (CWx)

13 Plaintiff,
14

REQUEST FOR ENTRY
OF DEFAULT

15 -against-
16

17 JIN O. CHA a/k/a JIN CHA, OK SPORTSWEAR,
18 EZ SPORTSWEAR, CHANG OH KIM a/k/a
19 CHANG O. KIM a/k/a CHUCK KIM, EDEN
20 SPORTS, INC., JUSTIN JU, SY SPORTS,
SUSAN LEE a/k/a SUSAN YOON, LEE'S
FAMILY, INC., GREEN T CORP., KYUNG
21 SOOK MA, CESAR IGIESIAS, BLING BLING, INC.,
KAUH UN LEE, ARTHUR BERMAN, WACKY
22 PLANET a/k/a WACKYPLANET.COM, a/k/a
THEPLANETSHOPS.COM, DAVID AHOUBIAN,
a/k/a DAVID AHOUBIN a/k/a DAVID AHOUBIM,
D&T DISTRIBUTION, PARIS FASHIONS,
CLOTHING ISLAND a/k/a CLOTHINGISLAND.COM,
PRINT LIBERATION, JAIME DILLON, NICK
23 PAPARONE, DR. JAY'S, INC. a/k/a DR. JAYS
a/k/a DR. JAYS.COM, MAGGI FASHION

1 WHOLESALE, INC., MANSOUR ROKHSARZADEH,
2 AZIZI AFSHIN a/k/a AFSHIN AZIZI, BARGIN
3 WHOLESALER CORPORATION a/k/a BARGIN
4 WHOLESALER.COM a/k/a WHOLESALECLOTHING
5 MARKET.COM a/k/a TBWHOLESALER.COM a/k/a
6 TOP BRANDS WHOLESALER a/k/a TOP BRANDS,
7 AHMAD JAMHOUR, OZ COMMUNICATIONS, INC.
8 a/k/a CRAZYTEES.NET, OTTO SUAREZ, OLGA LYONS,
9 SHOP RUMOR, LLC, ANOOSHKA ZAKARIAN,
10 ESTHER LEE, KEUM SPORTSWEAR CORP.,
11 CHAN SONG LEE, AFRICAN AMERICAN DOLLAR
12 STORE, EDNA CLEMENT SWAN, JACK LEIBERMAN
13 a/k/a JACK LIEBERMAN, PROGRESSIVERAGS.COM,
14 SKREENED, LLC, DANIEL CHRISTOPHER FOX, SHIEKH,
15 LLC d/b/a SHIEKH SHOES, INCREDIBLEGIFTS.COM,
16 DANIEL LASOFF, SHAKY CITY BLUES, MARIO
17 ONTIVEROS, MAIN COLLECTION, INC. a/k/a MAIN
18 SPORTSWEAR, SU YOUNG CHO, MB SPORTSWEAR,
19 CHOUNG H. CHOE, RIGHT THANG, HYO JANG YOON,
20 BUY MERCHANT, INC. a/k/a BUYMERCHANT.COM,
21 CRAIG N. BENTHAM, STEAL DEAL, INC. ABRAHAM
22 DAVOOD, MICHAEL DAVOOD, EBBY DAVOOD,
23 THE WILD SIDE, INC. a/k/a THEWILDSIDE.COM,
24 KINGSLEY SYME a/k/a KINGLEY SYMES,
25 SETUP SITE, INC. a/k/a HARRINGTON OUTLETS
26 a/k/a OBAMATSHIRTS.US, SOUR CANDY, SHOE
27 BALANCE INTERNATIONAL YAK SHOE INC.
28 a/k/a WHOLESALE SITUATION, JASON AREF, JULIO
AREF, WATCH TIME, INC., AZIZ R. ALI, UNISHOW
(USA), INC. a/k/a UNISHOW, INC., GARY CHEN, RENA
CHEN, AMILINE.COM, JIAN ZHU, GRAVITY TRADING,
INC., TONY IN CHONG,

Defendants.

X

TO THE CLERK OF THE COURT:

1 Plaintiff hereby requests that the Clerk of the Court enter default against
2 Defendants Watch Time, Inc., Aziz R. Ali, MB Sportswear, Choung H. Choe,
3 Kingsley Syme a/k/a Kingley Symes, Setup Site, Inc. a/k/a Harrington Outlets
4 a/k/a Obamatshirts.us., Maggi Fashion Wholesale, Inc., Mansour Rokhsarzadeh,
5 Right Thang, Hyo Jang Yoon, Sy Sports, Susan Lee a/k/a Susan Yoon, Lee's
6 Family, Inc., Eden Sports, Inc., Jack Lieberman a/k/a Jack Lieberman and
7 Progressiverags.com.
8

9 On February 3, 2010, MB Sportswear was served by leaving a copy of the
10 summons and complaint with the managing agent of said entity pursuant to Rule
11 4(h)(1)(B) of the Federal Rules of Civil Procedure and/or California Code of
12 Civil Procedure Section 416.10. Choung H. Choe was personally served with the
13 summons and complaint on February 3, 2010 pursuant to Rule 4(e)(2)(A) of the
14 Federal Rules of Civil Procedure and/or California Code of Civil Procedure
15 Section 415.10.
16

17 On April 9, 2010, Sy Sports, Eden Sports, Inc. and Lee's Family, Inc. were
18 served by leaving copies of the summons and complaint with someone apparently
19 in charge at said parties' place of business with copies of said documents mailed
20 on April 16, 2010 pursuant to California Code of Civil Procedure Section 416.20.
21 Susan Lee a/k/a Susan Yoon was served with the summons and complaint at her
22 place of business on April 9, 2010 with a copy mailed on April 16, 2010 pursuant
23 to California Code of Civil Procedure Section 415.20(b).
24

25 On March 16, 2010, Setup Site, Inc. a/k/a Harrington Outlets a/k/a
26 Obamatshirts.us was served by leaving a copy of the summons and complaint with
27
28

1 the managing agent of said entity pursuant to Rule 4(h)(1)(B) of the Federal Rules
2 of Civil Procedure. Kingsley Syme a/k/a Kingley Symes was personally served
3 with the summons and complaint on March 16, 2010 pursuant to Rule 4(e)(2)(A)
4 of the Federal Rules of Civil Procedure.

5
6 On February 1, 2010, Watch Time, Inc. was served by leaving a copy of
7 the summons and complaint with the person apparently in charge pursuant to
8 California Code of Civil Procedure Section 415.20. Aziz R. Ali was served with
9 the summons and complaint on February 3, 2010 with a copy of the summons
10 and complaint mailed on February 9, 2010 pursuant to California Code of Civil
11 Procedure Section 415.20(b).
12

13
14 On February 5, 2010, Maggi Fashion Wholesale, Inc. was served by leaving
15 a copy of the summons and complaint with the person apparently in charge at said
16 party's place of business and by mailing a copy of the summons and complaint on
17 February 8, 2010 pursuant to California Code of Civil Procedure Section 415.20.
18 Mansour Rokhsarzadeh was served with the summons and complaint on February
19 5, 2010 which was also mailed on February 8, 2010 pursuant to California Code of
20 Civil Procedure Section 415.10.
21

22
23 On March 2, 2010, Progressiverags.com was served by leaving a copy of
24 the summons and complaint with the managing agent of said entity pursuant to
25 Rule 4(h)(1)(B) of the Federal Rules of Civil Procedure. Jack Leiberman a/k/a
26 Jack Lieberman was served with the summons and complaint on March 2, 2010
27 pursuant to Rule 4(e)(2)(B) of the Federal Rules of Civil Procedure by leaving
28

1 said documents with a person of suitable age at said party's usual place of abode
2 or dwelling house.

3
4 On February 5, 2010, Right Thang was served by leaving a copy of the
5 summons and complaint with the person apparently in charge at said party's
6 place of business with a copy of the summons and complaint mailed on February
7 9, 2010 pursuant to California Code of Civil Procedure Section 415.20. Hyo
8 Jang Yoon was served with the summons and complaint on February 5, 2010
9 with a copy of the summons and complaint mailed on February 9, 2010 pursuant
10 to California Code of Civil Procedure Section 415.20(b).

11
12 The time to respond to the summons and complaint has elapsed as to said
13 defendants and neither has served or filed a responsive pleading.
14

15
16 WHEREFORE, it is respectfully requested that the Clerk enter default
17 against defendants Watch Time, Inc., Aziz R. Ali, MB Sportswear, Choung H.
18 Choe, Kingsley Syme a/k/a Kingley Symes, Setup Site, Inc. a/k/a Harrington
19 Outlets a/k/a Obamatshirts.us., Maggi Fashion Wholesale, Inc., Mansour
20 Rokhsarzadeh, Right Thang, Hyo Jang Yoon, Sy Sports, Susan Lee a/k/a Susan
21 ///

22 ///

23 ///

24 ///

1 Yoon, Lee's Family, Inc., Eden Sports, Inc., Jack Lieberman a/k/a Jack Lieberman
2 and Progressiverags.com.
3

4 Dated: May 25, 2010
5 Los Angeles, CA

Respectfully submitted,

6 By:s/Kenneth A. Feinswog
7 KENNETH A. FEINSWOG
8 Attorney for Plaintiffs
9 6701 Center Drive West, Suite 610
10 Los Angeles, CA 90045
11 (310) 846-5800
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28